

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-CV-80232-ROSENBERG/REINHART

MANIRAJ ASHIRWAD GNANARAJ,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiffs,

-v.-

LILIUM N.V. F/K/A QELL  
ACQUISITION CORP. *et al.*,

Defendants.

**DEFENDANTS' UNOPPOSED REQUEST FOR ENTRY OF JUDGMENT**

Defendants Lilium N.V. f/k/a Qell Acquisition Corp., Barry Engle, Daniel Wiegand, Geoffrey Richardson, Yves Yemsi, and Alastair McIntosh, (“Defendants”) hereby respectfully submit this Request for Entry of Judgment pursuant to Federal Rule of Civil Procedure 58(d) as follows:

1. The Court granted Defendants’ motion to dismiss and dismissed the Second Amended Complaint without leave to amend on August 23, 2024.
2. The order vacated all future dates and ordered the clerk to terminate the matter and close the case.
3. Rule 58(b)(1)(C) provides that judgments shall be issued on orders denying all relief. Under Rule 58(a), such judgments shall be set out in a separate document.
4. Pursuant to Rule 58(d), and to avoid any lack of clarity, Defendants respectfully request that judgment be entered for Defendants. A proposed judgment is attached hereto.
5. Pursuant to Local Rule 7.1(a)(3), counsel for Defendants have conferred with

counsel for Plaintiff, who consent to this Request for Entry of Judgment.

Dated: September 25, 2024

Respectfully submitted,

/s/ Bradley S. Shraiberg

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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was furnished via Notice of Electronic Filing by CM/ECF to all parties registered to receive such service in this case on this the 25<sup>th</sup> day of September 2024.

/s/ Bradley S. Shraiberg

Bradley S. Shraiberg